

EXHIBIT 4

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7 Attorneys for Defendants
8 Royce International Broadcasting
9 Corporation, Playa Del Sol Broadcasters,
10 Silver State Broadcasting, LLC, Golden
11 State Broadcasting, LLC, and Edward R.
12 Stolz, II

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **EASTERN DIVISION**

16 W.B. MUSIC, INC., et al

17 Plaintiffs

18 v.

19 ROYCE INTERNATIONAL
20 BROADCASTING INC. et. al.

21 Defendants.

Case No. 5:16-cv-00600-JGB-SP

Hon. Jesus G. Bernal

**DECLARATION OF DONALD
CHARLES SCHWARTZ, ESQ. IN
OPPOSITION TO EX PARTE
APPLICATION FOR WRIT OF
ATTACHMENT; NOTICE OF
BANKRUPTCY**

Date: May 5, 2023

Time: 2:00 p.m.

Dept: Hon. Jesus Bernal

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2 I, Donald Charles Schwartz, declare:

3 I am counsel in this action for all defendants herein.

4 I have notified movants' counsel of defendants' opposition to the application for writs
5 of attachment on each of the following grounds:

- 6 1. Defendants are informed and believe that the amounts sought to be collected are pending
7 claims in the United States Bankruptcy Court, District of Nevada in the related Silver
8 State and Golden State bankruptcies.
- 9 2. Defendants have no proposed writs of attachment so it is not known what assets are
10 proposed to be attached. Likely, these are assets under the jurisdiction of the United
11 States Bankruptcy Court, District of Nevada and might be subject to the contempt
12 powers of that Court.
- 13 3. These parties also object because there is no jurisdiction shown for the establishment of
14 this receivership resultant from the Receiver never verifying that he has taken the oath of office
15 as ordered by this Court.

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Dated May 5, 2023.

19 Respectfully submitted,

20 /s/ Donald Charles Schwartz

21 Donald Charles Schwartz, Esq.
22 Associated Attorney for Defendants
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